

RECEIVED

James L Murphy III (615) 252-2303 Fax (615) 252-6303

2004 NOV 15 EPRAN Introff 20 boultcummings com

November 15, 2004 T.R.A. DOCKET ROOM

Honorable Pat Miller, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

In Re

Petition to Intervene of MClmetro Access Transmission Services, LLC

Docket No. 04-00381

Dear Chairman Miller

Enclosed please find the original plus fourteen (14) copies of MCImetro Access Transmission Services, LLC's Petition to Intervene in the above-referenced docket. A copy has been served on BellSouth Telecommunications, Inc

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Bv

James L Murphy III

JLM/s₁a

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

November 15, 2004

In Re BellSouth's Petition to Establish)		
Generic Docket to Consider Amendments)	Docket No	04-00381
to Interconnection Agreements Resulting)		
from Changes of Law)		

PETITION TO INTERVENE OF MCIMETRO ACCESS TRANSMISSION SERVICES, LLC.

MCImetro Access Transmission Services, LLC ("MCI") petitions the Tennessee Regulatory Authority ("Authority") to intervene as a matter of right in the above-captioned proceeding pursuant to T.C A § 4-5-310.

The petition filed by BellSouth Telecommunications, Inc ("BellSouth") seeks to open a generic proceeding for the purposes of, according to BellSouth, "determin[ing] what changes recent decisions from the Federal Communications Commission ("FCC") and the United States Court of Appeals for the District of Columbia Circuit ("DC Circuit") require in existing approved interconnection agreements between BellSouth and competitive local exchange carriers ("CLECs") in Tennessee "¹

MCI holds a Certificate of Public Convenience and Necessity to provide competing local telecommunications services in Tennessee This proceeding will address, among other things, the terms and conditions under which MCI may operate in Tennessee and, therefore, may determine MCI's legal rights, duties, privileges, immunities or other loyal interests

1004523 v3 058100-000 11/15/2004

¹ BellSouth's Petition to Establish Generic Docket, Docket No. 04-00381, p. 1, filed October 29, 2004

Furthermore, granting this intervention is in the interest of justice and will not impair the orderly and prompt conduct of this proceeding

MCI, therefore, respectfully asks that the Authority grant this Petition to Intervene

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

James Murphy III 414 Union Street, Suite 1600

P O Box 198062

Nashville, Tennessee 37219

(615) 252-2306

1004523 v1 058100-000 11/15/2004

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2004, a copy of the foregoing document was served on the parties of record, via electronically, U S mail or hand delivery.

Guy Hicks BellSouth Telecommunications, Inc 333 Commerce St , Suite 2101 Nashville, TN 37201

James L Murphy III

1004523 v1 058100-000 11/15/2004